THE UNITED STATES DISTRICT COURT DISTRICT OF NEW MEXICO

EMPLOYBRIDGE, LLC, a California Limited Liability Company, and EMPLOYMENT SOLUTIONS MANAGEMENT, INC., a Georgia Corporation,

Case No. 16-833-WJ/KK

Plaintiffs.

v.

RIVEN ROCK STAFFING, LLC, a Nevada Limited Liability Company, LARRY SHAUN SHEPHERD, an individual, CATHERINE OLINGER, an individual, TERRY MILLER, and individual, TIMOTHY JACQUEZ, an individual, and Does 1 through 25, inclusive,

Defendants.

INDEX AND COMPENDIUM OF EXHIBITS IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT RE: CITY OF ALBUQUERQUE CLAIMS and PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT RE: NON-CITY OF ALBUQUERQUE CLAIMS¹

- **Exhibit A Excerpts of Deposition of Terrie Doty**
- **Exhibit B Deposition Exhibit 88**
- **Exhibit C Excerpts of Deposition of Amber Fluitt**
- Exhibit D Excerpts of Deposition of Donyelle Rose
- **Exhibit E Excerpts of Deposition of Terry Miller**
- **Exhibit F Excerpts of Deposition of Catherine Olinger**
- Exhibit G Deposition Exhibit 139 Attorneys Eyes Only
- Exhibit H Excerpts of Deposition of Larry Shaun Shepard
- Exhibit I Excerpts of 30(b)(6) Deposition of Larry Shaun Shepard
- Exhibit J Map of Distance between Riven Rock and EmployBridge
- **Exhibit K Deposition Exhibit 74**

_

¹ Pursuant to D.N.M. LR.-Civ. 10.5, counsel for Plaintiffs has conferred with counsel for Defendants, who has agreed to an exhibit page extension beyond the page limits set forth in D.N.M. LR.-Civ. 10.5.

- **Exhibit L Deposition Exhibit 120**
- Exhibit M Excerpts of Deposition of Timothy Jacquez
- **Exhibit N Deposition Exhibit 29**
- **Exhibit O Excerpts of Deposition of Fran Scott**
- **Exhibit P Deposition Exhibit 121 Confidential**
- Exhibit Q Deposition Exhibit 10 Attorneys Eyes Only
- Exhibit R Deposition Exhibit 11 Confidential
- **Exhibit S Deposition Exhibit 12 Confidential**
- Exhibit T Deposition Exhibit 13 Confidential
- **Exhibit U Deposition Exhibit 14**
- Exhibit V Deposition Exhibit 15 Attorneys Eyes Only
- Exhibit W Deposition Exhibit 16 Attorneys Eyes Only
- Exhibit X Deposition Exhibit 33
- **Exhibit Y Deposition Exhibit 49**
- Exhibit Z Deposition Exhibit 3

DATED: May 30, 2017 Respectfully submitted,

/s/ Daniel P. Hart /

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A. tstahl@rodey.com 201 Third Street NW, Suite 2200 Albuquerque, New Mexico 87102 Telephone: (505) 768-7240

Telephone: (505) 768-7240 Facsimile: (505) 768-7395

SEYFARTH SHAW LLP Daniel P. Hart 1075 Peachtree Street, NE, Suite 2500 Atlanta, Georgia 30309 Telephone: (404) 881-5433

Facsimile: (404)

SEYFARTH SHAW LLP Michael Cross 400 Capitol Mall Suite 2350 Sacramento, CA 95814-4428 Telephone: (916) 498-7017 Facsimile: (916) 288-6330

Attorneys for Plaintiffs EMPLOYBRIDGE, LLC and EMPLOYMENT SOLUTIONS MANAGEMENT, INC.

CERTIFICATE OF SERVICE

I certify that on May 30, 2017, I filed the foregoing INDEX AND COMPENDIUM OF EXHIBITS IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT RE: CITY OF ALBUQUERQUE CLAIMS and PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT RE: NON-CITY OF ALBUQUERQUE CLAIMS and that it was served on Defendants via the Court's CM/ECF electronic filing system to the following counsel of record, as reflected on the Notice of Electronic Filing (NEF):

Christopher M. Moody Repps D Stanford Moody & Warner PC 4169 Montgomery Blvd. NE Albuquerque, NM 87109 moody@nmlaborlaw.com stanford@nmlaborlaw.com

> /s/ Daniel P. Hart / Attorney for Plaintiffs